

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CHLOE HAPPE,)	
)	
<i>Plaintiff,</i>)	Case No. 4:24-cv-622-MTS
)	
v.)	
)	
BLOCK, INC.,)	
)	
<i>Defendant.</i>)	
)	

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff Chloe Happe (“Plaintiff”) and Defendant Block, Inc. (“Block”) (together, the “Parties”), by and through their undersigned counsel, hereby jointly stipulate and agree as follows:

WHEREAS, on March 28, 2024, Happe filed an action against Block alleging violations of Mo. Rev. Stat. § 130.028 in the Circuit Court for Lincoln County, Missouri, *see* ECF No. 1-1;

WHEREAS, on May 3, 2024, Block removed the case to this Court, ECF No. 1;

WHEREAS, on May 23, 2024, the Parties jointly moved to stay the case pending arbitration, ECF No. 16;

WHEREAS, on September 5, 2024, this Court referred the case to arbitration and stayed the case through completion of the arbitration, ECF No. 32;

WHEREAS, the arbitration has been concluded; and

THEREFORE, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Parties hereby stipulate and agree that this action be dismissed with prejudice, without an award of costs, expenses, disbursements, or attorneys' fees.

Respectfully submitted,

/s/ Timothy Belz

Timothy Belz, Bar No. 31808MO
CLAYTON PLAZA LAW GROUP, LC
112 South Hanley, Suite 200
Clayton, MO 63105
Telephone: 314.726.2800
Facsimile: 314.863.3821
tbelz@olblaw.com

/s/ Gene C. Schaerr

Gene C. Schaerr*
H. Christopher Bartolomucci*
Edward H. Trent*
SCHAERR | JAFFE LLP
1717 K Street, N.W., Suite 900
Washington, D.C. 20006
Telephone: 202.787.1060
gschaerr@schaerr-jaffe.com
cbartolomucci@schaerr-jaffe.com
etrent@schaerr-jaffe.com

Attorneys for Plaintiff Chloe Happe

*Admitted *Pro Hac Vice*

/s/ Naima L. Farrell (with permission)

Patricia J. Martin, Bar No. 57420MO
Lillian T. Manning, Bar No. 68432MO
LITTLER MENDELSON, P.C.
600 Washington Avenue
Suite 900
St. Louis, MO 63101
Telephone: 314.659.2000
Facsimile: 314.667.3760
pmartin@littler.com
lmanning@littler.com

Jason C. Schwartz*

Naima L. Farrell*

Catherine McCaffrey*

GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Telephone: 202.955.8500
Facsimile: 202.467.0539
jschwartz@gibsondunn.com
nfarrell@gibsondunn.com
cmccaffrey@gibsondunn.com

Attorneys for Defendant Block, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on all registered parties on this 18th day of June, 2025, using the Court's online filing system.

/s/ Gene C. Schaerr
Gene C. Schaerr